



### **Exhibit A Paragraph 30(b) Certification**

This certification addresses activities conducted during the period from January 31, 2019 through July 31, 2019 (the "Certification Period").

#### **Paragraph 8:**

NYCHA plans to meet the requirement under paragraph 8 to abate all lead-based paint at the Harlem River Houses and the Williamsburg Houses through the Rental Assistance Demonstration (RAD) Program. The RAD contracts for these developments are currently scheduled to close in late 2020, and they will require the development partner to abate all lead-based paint in these developments.

#### **Paragraph 9 – 12:**

NYCHA will develop abatement schedules for other apartment units that contain lead-based paint on the basis of the information obtained from the ongoing X-ray fluorescence testing initiative. NYCHA has not yet developed an Action Plan to address the obligations contained in Paragraph 12.

#### **Paragraph 13:**

NYCHA uses the meaning of "common areas" and "abatement" as defined in 40 C.F.R., part 745, subpart L.

#### **Paragraph 14:**

NYCHA cannot certify to compliance with all the legal requirements applicable to abatement of lead-based paint in connection with work conducted during the Certification Period. Based on analysis by the Compliance Department, NYCHA has determined that, among other things, it lacks adequate procedures, IT controls, recordkeeping, and/or quality assurance monitoring as to a number of abatement requirements. Particular deficiencies include deficiencies relating to the requirements to prepare abatement reports, required notifications, and recordkeeping.

#### **Paragraph 15:**

NYCHA cannot certify to compliance with all the legal requirements set forth in the Lead Safe Housing Rule, 24 C.F.R. part 35, subparts B-R, and the Renovation, Repair, and Painting (RRP) Rule, 40 C.F.R. part 745, subpart E in connection with repair and maintenance work conducted during the Certification Period. Based on analysis by the Compliance Department, NYCHA has determined that, among other things, it lacks, in certain areas, adequate procedures, IT controls, recordkeeping, and/or quality assurance monitoring as to a number of lead safe work practice and RRP requirements. Particular deficiencies include deficiencies relating to the requirements to conduct clearance examinations, issue resident notifications, and complete required checklists.

I, a duly authorized representative of the New York City Housing Authority (NYCHA),  
certify to the foregoing.

A handwritten signature in black ink, appearing to read 'Vito Mustaciuolo', written over the printed name.

VITO MUSTACIUOLO  
GENERAL MANAGER

July 31, 2019